

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

)
UNITED STATES OF AMERICA) Criminal No. 20cr10192
)
v.) DEFENDANT'S FIFTH ASSENTED
) TO MOTION TO EXTEND TIME
) TO FILE MOTION TO SUPPRESS
TEVON NGOMBA, a/k/a "Chow,") AND REVIEW PLEA OFFER WITH
Defendant.) DEFENDANT
)
)

NOW COMES the Defendant and hereby respectfully moves this Honorable Court to extend the time to file a motion to suppress and to allow time to review a plea offer with the Defendant.

As grounds therefore, the Defendant's counsel states:

1. The defendant's Motion to Suppress is due on October 18, 2021.
2. The defendant's counsel had contracted Coronavirus in mid-September. As a result, he lost almost three (3) full weeks of work and is still catching up.
3. The defendant's counsel also needs additional time to review his draft of the motion to suppress with his client by traveling to Plymouth County Correctional Facility.
4. The defendant's counsel would also like to review his draft of the motion to suppress with an Attorney from the Federal Defender's Office, who has been acting as a mentor.
5. In the meantime, the Government and defense counsel are discussing a possible resolution of the case, which includes a review of a plea offer with the Defendant. The parties are exploring whether a resolution may be reached by or before October 26, 2021, the currently scheduled date for the appeal of the Defendant's detention ruling. Should a resolution be reached,

32ND ANNIVERSARY

J. DANIEL SILVERMAN
ATTORNEY AT LAW
669 MAIN STREET
WAKEFIELD, MA 01880
(781) 245-9019
FAX (781) 246-0850

the parties may seek either to convert the October 26, 2021 hearing date to a Rule 11 hearing, or, conversely, request a date close in time to that date on which to schedule the Rule 11 hearing.

6. Should plea discussions over the next two weeks not result in a resolution, Defendant's counsel would like to extend the filing of the Motion to Suppress to a later date. To that end, the parties propose filing a Status Report with the Court by or before October 29, 2021, setting forth a proposed briefing schedule for the suppression motion.
7. Defendant's counsel has conferred with counsel for the Government, who assents to this request.

WHEREFORE, the Defendant, through counsel, respectfully requests this motion be allowed.

Respectfully submitted,
Tevon Ngomba,
By his attorney,

/s/ J. Daniel Silverman

J. Daniel Silverman
669 Main Street
Wakefield, MA 01880
(781) 245-9019
Jds01880@verizon.net
BBO: 555491

Date:

10-15-21

32ND ANNIVERSARY

J. DANIEL SILVERMAN
ATTORNEY AT LAW
669 MAIN STREET
WAKEFIELD, MA 01880
(781) 245-9019
FAX (781) 246-0850